

WEINBERG WHEELER
HUDGINS GUNN & DIAL



Jeremy R. Alberts, Esq.
jalberts@wwhgd.com
Nevada Bar No. 10497
WEINBERG, WHEELER, HUDGINS,
GUNN & DIAL, LLC
6385 South Rainbow Blvd., Suite 400
Las Vegas, Nevada 89118
Telephone: (702) 938-3838

*Local Counsel for Plaintiff,
Ernest Bock L.L.C.*

John F. Palladino, Esq.
john@hpattorneys.com
Evan M. Labov, Esq.
evan@hpattorneys.com
HANKIN PALLADINO WEINTROB
BELL & LABOV, P.C.
30 South New York Avenue
Atlantic City, NJ 08401
Telephone: (609) 344-5161

*Pro Hac Counsel for Plaintiff,
Ernest Bock L.L.C.*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

ERNEST BOCK, L.L.C.,

Plaintiff,

vs.

Case No.: 2:19-cv-01065-JAD-EJY

PAUL STEELMAN, individually; MARYANN
STEELMAN, individually; PAUL STEELMAN,
as trustee of the Steelman Asset Protection Trust;
MARYANN STEELMAN, as trustee of the
Steelman Asset Protection Trust; JIM MAIN, as
trustee of the Steelman Asset Protection Trust;
STEPHEN STEELMAN; SUZANNE
STEELMAN-TAYLOR; PAUL STEELMAN as
trustee of the Paul C. Steelman and Maryann T.
Steelman Revocable Living Trust; MARYANN
STEELMAN, as trustee of the Paul C. Steelman
and Maryann T. Steelman Revocable Living Trust;
PAUL STEELMAN, as the trustee of the Paul
Steelman Gaming Asset Protection Trust;
KEEPSAKE, INC.; SMMR, LLC; SMMR, LLC,
SERIES A-Z; SSSSS, LLC; SSSSS, LLC, SERIES
B; CHRISTIANA, LLC; CHRISTIANA, LLC,
SERIES A-Z; COMPETITION INTERACTIVE,
LLC; PAUL STEELMAN, LTD.; STEELMAN
PARTNERS, LLP; PAUL STEELMAN DESIGN
GROUP, INC.; SAPT HOLDINGS, LLC, SERIES
B; AARON SQUIRES; and MATTHEW
MAHANEY,

Defendants.

STIPULATION



Plaintiff Ernest Bock, L.L.C. (“Bock”), the Steelman Parties¹, the Corporate Defendants², and Matthew Mahaney, Esq. (“Mahaney”) by and through their respective undersigned counsel, hereby submit this Stipulation (the “Stipulation”), subject to the Court’s approval, to provide that the disclosure of certain information and materials shall not result in the waiver of attorney-client privilege, work product, or any related privileges or protections.

The Parties are presently working to resolve certain disputes related to a privilege log produced by Bock in this matter. The same log was produced in related New Jersey litigation and was subject to two days of transcribed hearings before a special discovery master. As a result of those hearings, certain materials were produced for the first time or produced with revised redactions by Bock in the New Jersey litigation. Such proceedings and productions were, as agreed by the parties and directed by the special discovery master, without any waiver of privilege, work product, or related privileges or protections.

To assist in resolving their disputes regarding that log in this matter, Bock is willing to produce the hearing transcripts and post-hearing productions referenced above, so long as there are no waivers as a result. All Defendants have agreed that there will be no waiver as a result of such disclosures and have agreed to submit a stipulation obtaining an order of the Court that the disclosure will not result in waiver.

Federal Rule of Evidence 502(d) permits the Court to order that no waiver of privilege or protection results from a disclosure. Based on the foregoing, the Parties respectfully request that the Court grant this stipulation and Order that the disclosures discussed herein will not waive any

¹ The “Stelman Parties” refer to Defendants Paul Steelman, individually; Maryann Steelman, individually; Paul Steelman, as trustee of the Steelman Asset Protection Trust (“SAPT”); Maryann Steelman, as trustee of the SAPT; Jim Main, as trustee of the SAPT; Stephen Steelman; Suzanne Steelman-Taylor; Paul Steelman, as trustee of the Paul C. Steelman and Maryann T. Steelman Revocable Living Trust (“RLT”); Maryann Steelman, as trustee of the RLT; and Paul Steelman, as trustee of the Paul Steelman Gaming Asset Protection Trust.

² The “Corporate Defendants” refer to Christiania, LLC; Christiania, LLC, Series A-Z; Competition Interactive, LLC; Keepsake, Inc.; Paul Steelman Design Group, Inc.; Paul Steelman, Ltd.; SAPT Holdings, LLC, Series B; SMMR, LLC; SMMR, LLC, Series A-Z; SSSSS, LLC; SSSSS, LLC, Series, B; and Steelman Partners, LLP. Bock named SMMR, LLC, Series A-Z and Christiania, LLC, Series A-Z as defendants and contends that they consist of fifty-two (52) separate defendants (i.e., SMMR, LLC, Series A; SMMR, LLC, Series B; etc.). The Corporate Defendants disagree. In the interest of brevity, those defendants have been stylized as “Series A-Z.”

attorney-client privilege, work product protection, or other related privilege or protection.

DATED: June 24, 2025.

DATED: June 24, 2025.

**HANKIN PALLADINO WEINTROB
BELL & LABOV, P.C.**

**BROWNSTEIN HYATT FARBER
SCHRECK, LLP**

BY: /s/ Evan M. Labov
EVAN M. LABOV, ESQ. (*pro hac vice*)
evan@hpatorneys.com
30 South New York Avenue
Atlantic City, NJ 08401
Pro-Hac Counsel for Plaintiff

BY: /s/ Frank M. Flansburg
FRANK M. FLANSBURG III, ESQ., #6974
fflansburg@bhfs.com
100 North City Parkway, Suite 1600
Las Vegas, NV 89106-4614
Attorneys for the Steelman Parties

DATED: June 24, 2025.

DATED: June 24, 2025.

GREENBERG TRAURIG, LLP

**SOLOMON DWIGGINS FREER &
STEADMAN, LTD.**

BY: /s/ Jerrell Berrios
JOEL EDWARD TASCA, ESQ.
JERRELL BERRIOS, ESQ.
joel.tasca@gtlaw.com
berriosj@gtlaw.com
10845 Griffith Peak Drive, Suite 600
Las Vegas, NV 89135
Attorney for Corporate Defendants

BY: /s/ Roberto M. Campos
ROBERTO M. CAMPOS, ESQ.
rcampos@sdfnlaw.com
9060 West Cheyenne Avenue
Las Vegas, NV 89129
Attorney for Matthew Mahaney, Esq.

ORDER

IT IS SO ORDERED on this 25th day of June, 2025.


UNITED STATES MAGISTRATE JUDGE

